Summary
Board Bill Number 106
Introduced by Alderwoman Jami Cox Antwi

An ordinance directing the Community Development Administration to use the 21st Century ROAD to Housing Act to expend housing construction, rehabilitation, and preservation in St. Louis. Reports due March 1 and September 30, 2027, must identity federal requirements, funding opportunities, and the local legislation, resources, and approvals needed to put useful housing tools to work, equipping City officials to address barriers and advance additional housing.

BOARD BILL NUMBER 106 INTRODUCED BY ALDERWOMAN JAMI COX ANTWI

An ordinance to be known as the "St. Louis Housing Opportunities through Unified Strategy and Execution (HOUSE) Act," directing the Community Development Administration to complete and present a Compliance and Readiness Report by March 1, 2027, and a Funding Opportunities Report by September 30, 2027, to the Housing, Urban Development and Zoning Committee of the Board of Aldermen concerning applicable federal housing requirements, recommended City actions, and relevant funding opportunities under the 21st Century ROAD to Housing Act; and containing effective-date and severability provisions.

WHEREAS, increasing housing production and preserving existing homes can expand housing choices and support affordability for current and future City residents; and

WHEREAS, the 21st Century ROAD to Housing Act, Public Law 119-101, creates and modifies federal housing tools, and the City should be prepared to turn applicable program flexibilities and funding opportunities into additional housing; and

WHEREAS, identifying legal, administrative, data, staffing, and funding barriers can help the City determine which actions and resources are needed to enable housing construction, rehabilitation, and reuse; and

WHEREAS, the Board of Aldermen seeks to connect these federal tools to practical City decisions that support housing production and preservation, expand access to housing opportunity, and address displacement risks, so that the assessment required by this ordinance guides actions to increase and preserve the City's housing supply;

BE IT ORDAINED BY THE CITY OF ST. LOUIS, AS FOLLOWS:

SECTION ONE. Definitions.

For purposes of this ordinance, the following terms have the meanings stated below:

"Act": The 21st Century ROAD to Housing Act, Public Law 119-101.

"Annual Action Plan": The City's annual plan submitted to the United States Department of Housing and Urban Development under its consolidated planning requirements.

"CDBG": The federal Community Development Block Grant program.

"City": The City of St. Louis.

"Community Development Administration or CDA": The Community Development Administration of the City.

"Compliance and Readiness Report": The one-time report required by Section Two, with the contents required by Section Three, subsection 1, and the common requirements in Section Three, subsection 3.

"Funding Opportunities Report": The one-time report required by Section Two, with the contents required by Section Three, subsection 2, and the common requirements in Section Three, subsection 3.

"HOME": The federal HOME Investment Partnerships Program.

"HUDZ Committee": The Housing, Urban Development and Zoning Committee of the Board of Aldermen.

SECTION TWO. Reports.

CDA shall prepare a Compliance and Readiness Report and a Funding Opportunities Report as required by this ordinance. CDA shall be solely responsible for each report's findings and recommendations.

SECTION THREE. Report Contents.

1. Compliance and Readiness Report. The Compliance and Readiness Report shall include the following:

a. Compliance Requirements. Identify each requirement of the Act applicable to the City as a recipient of CDBG or HOME funds. For each such requirement, state the applicable federal deadline, the City's current compliance status, the office responsible for compliance, and the date by which the City anticipates achieving compliance.

b. CDBG Housing Growth Adjustments. State whether the City is subject to, or exempt from, the provisions of the Act that adjust CDBG allocations on the basis of housing growth, together with the basis for that determination. If the City is or may become subject to such provisions, estimate the City's standing under the applicable formula and the anticipated effect on the City's allocation, identifying any material information not yet available.

c. Competitive Opportunities. For the competitive programs established under sections 202, 207, 208, 209, and 210 of the Act, and any other competitive program under the Act that CDA determines to be relevant:

i. Available Authority and Information. Identify the applicable federal authority and the available program information supporting CDA's initial recommendation, including material federal requirements or guidance that remain unsettled.

ii. Initial Recommendation. State CDA's recommendation as to whether the City should pursue the opportunity, the basis for that recommendation, and any material uncertainties affecting it.

iii. Legal Barriers. Identify legal barriers to an application or to the use of an award, including any material legal question that cannot yet be resolved.

d. Existing Program Modifications. Identify any new eligible uses or program flexibilities established by the Act within the City's CDBG and HOME programs that CDA recommends the City adopt, together with the Annual Action Plan year in which each would take effect and any subsequent City action or approval required.

2. Funding Opportunities Report. For each competitive opportunity examined in the Compliance and Readiness Report and any additional competitive opportunity under the Act that CDA determines to be relevant, the Funding Opportunities Report shall include the following:

a. Federal Authority and Availability. State the applicable federal authority; whether funds have been appropriated; whether implementing guidance and a notice of funding opportunity have been issued; whether an application period is open; and the stated eligibility requirements and selection criteria.

b. Requirements and Obligations. State any published application deadline, eligible uses, matching or continuing obligations, and reporting requirements; and identify requirements that remain unsettled.

c. Administrative, Data, and Funding Barriers. Identify administrative, data, or funding barriers to an application or to the use of an award.

d. Updated Recommendations. State CDA's current recommendation as to whether the City should pursue the opportunity and explain any change from the initial recommendation, including any change arising from newly available federal information or legal requirements.

e. Consolidated Timeline. Include a consolidated timeline of the federal and City deadlines identified in either report.

f. Updated Findings. Identify any material changes to the Compliance and Readiness Report's findings concerning compliance requirements, CDBG housing growth adjustments, or existing program modifications. CDA may incorporate unchanged findings from the Compliance and Readiness Report by reference, identifying the incorporated provisions.

3. Common Requirements. Each report shall address the following in relation to its findings and recommendations:

a. City Actions and Resource Needs. Identify the actions and resources required for the City to comply with applicable requirements of the Act, separately from the actions and resources CDA recommends to improve the City's readiness or competitiveness for assistance under the Act, including housing production data, staffing, local funding, and any ordinance, appropriation, or other action required of the Board of Aldermen. For each recommended City action, identify whether a subsequent ordinance, rule, appropriation, procurement, or agency approval is needed; the office or entity responsible for the action; the staff and other resources reasonably estimated to be needed; and the relevant planning, budget, or approval cycle and anticipated timing of the action.

b. Existing City Work and Barriers. Identify pertinent City laws, plans, programs, practices, and available data; distinguish actions that are enacted, operating, proposed, or unverified; and identify legal, administrative, data, or funding barriers to the recommended action.

c. Effects. For each recommended action, assess its reasonably ascertainable effects on housing production, affordability, access to housing opportunity, displacement and preservation risks, administrative capacity, and applicable federal criteria.

d. Evidence and Limitations. CDA may rely on existing City housing plans and data, but shall identify any material limitations in them. Neither report shall treat the adoption of a local reform, by itself, as evidence that the City satisfies a federal criterion based on measured growth in housing supply. Findings concerning information that has not been issued or is not reasonably available shall identify that limitation rather than presume the information exists.

SECTION FOUR. Cooperation with City Offices.

1. City Departments. City departments with offices and duties related to planning, building, zoning, budgeting, and housing shall, within thirty (30) days of a request from CDA, provide reasonably available information within their lawful authority. An unanswered request does not extend the deadline for completing and presenting either report; CDA shall identify the resulting gap in the affected report.

2. Other Entities. CDA may request information from the St. Louis Development Corporation, the Affordable Housing Commission, and land-reutilization or redevelopment bodies, but this section imposes no duty on those entities and does not alter their authority.

SECTION FIVE. Completion and Presentation.

1. Compliance and Readiness Report. By March 1, 2027, CDA shall complete the Compliance and Readiness Report and present it at a public meeting of the HUDZ Committee.

2. Funding Opportunities Report. By September 30, 2027, CDA shall complete the Funding Opportunities Report and present it at a public meeting of the HUDZ Committee.

3. Finite Assignment. The assignment imposed by this ordinance consists of these two one-time reports. This ordinance does not require annual updates or other recurring reports.

SECTION SIX. Grant Decisions; Existing Law.

1. Grant Decisions. CDA shall determine whether and when to apply for assistance under the Act within its lawful authority and subject to applicable application, acceptance, fiscal, procurement, and appropriation requirements.

2. Existing Authority and Approvals. This ordinance does not authorize any application or expenditure; create a new Board approval for any grant decision; adopt any design or zoning change; approve a site, permit, incentive, land disposition, redevelopment plan, or housing project; or waive any otherwise applicable law or approval.

3. Protected Information. Any disclosure under this ordinance remains subject to applicable law governing confidential, privileged, or otherwise protected information.

SECTION SEVEN. Effective Date.

This ordinance shall take effect thirty (30) days after its approval by the Mayor or thirty (30) days after its adoption over the Mayor's veto.

SECTION EIGHT. Severability Clause.

The provisions of this ordinance are severable. If any provision or its application to any person or circumstance is held invalid, the remaining provisions and applications shall remain effective to the extent they can be given effect in accordance with the intent of the Board of Aldermen.